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4 Counsel for Defendant PINEDA
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6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA
 8 SAN FRANCISCO DIVISION
 9

10 UNITED STATES OF AMERICA,) NO. CR 23-00130 JD (LB)
)
11 Plaintiff,) STIPULATION AND PROPOSED ORDER TO
) CONTINUE DEFENDANT SEVERO PINEDA'S
12 v.) JANUARY 27, 2025 CHANGE OF PLEA
) HEARING TO FEBRUARY 24, 2025
13 SEVERO PINEDA,)
)
14 Defendant.)
)
15 _____)

16
 17 Counsel for defendant Severo Pineda and counsel for the United States, Assistant United States
 18 Attorney Dan Karmel hereby stipulate and request a continuance of the change of plea hearing that was
 19 scheduled by the Court for January 27, 2025.

20 Undersigned defense counsel for Mr. Pineda makes the request for the following reasons: 1) the
 21 parties are in ongoing discussions to finalize resolution of the case; and 2) counsel for Mr. Pineda
 22 represents a witness at a trial in the Eastern District and needs to travel to Fresno, California on January
 23 27, 2025 and is therefore unavailable on the currently-scheduled date. The parties are available on
 24 February 24, 2025. Mr. Pineda has been compliant with the conditions of his pretrial release and the
 25 pretrial officer has confirmed that he is in regular contact with his assigned officer.

26 Furthermore, counsel for the United States and undersigned counsel for Severo Pineda stipulate
 27 that time should be excluded under the Speedy Trial Act from January 27, 2025, through February 24,

28 STIPULATION TO CONTINUE JANUARY 27, 2025:
 CHANGE OF PLEA HEARING TO FEBRUARY 24, 2025;
~~PROPOSED~~ ORDER
 Case No. CR 23-00130 JD (LB)

v. 7/10/2018

2025. The government and counsel for the defendant agrees that time should be excluded under the Speedy Trial Act so that defense counsel can be available for the hearing and continue to prepare including by reviewing discovery produced by the government. The parties therefore stipulate and agree that excluding time until February 24, 2025, will allow for the continuity and effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from January 27, 2025, through February 24, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned defense counsel certifies that she has obtained the approval of the Assistant United States Attorney to file this stipulation and proposed order.

DATED: January 17, 2025

/s/ K. Alexandra McClure

K. ALEXANDRA MCCLURE
Counsel for Defendant SEVERO PINEDA

DATED: January 17, 2025

/s/ Dan Karmel

DAN KARMEL
Counsel for THE UNITED STATES

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the change of plea hearing currently scheduled for January 27, 2025, is continued to February 24, 2025. Time is excluded under the Speedy Trial Act to and including February 24, 2025.

IT IS SO ORDERED.

DATED: January 23, 2025



HON. JAMES DONATO
United States District Court Judge

STIPULATION TO CONTINUE JANUARY 27, 2025:
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